

# South Carolina Department of Natural Resources

1000 Assembly Street Suite 336  
PO Box 167  
Columbia, SC 29202  
803.734.3766 Office  
803.734.9809 Fax  
[perryb@dnr.sc.gov](mailto:perryb@dnr.sc.gov)



Alvin A. Taylor  
Director  
Robert D. Perry  
Director, Office of  
Environmental Programs

April 3, 2017

Ms. Heather M. Robbins, AICP  
Director of Environmental Services  
South Carolina Department of Transportation  
955 Park Street, Room 509  
Columbia, South Carolina 29201

REFERENCE: I-73 South Re-evaluation; Dillon, Horry, Marion, Marlboro Counties  
I-73 North Re-evaluation; Dillon and Marlboro Counties

Dear Ms. Robbins

The South Carolina Department of Natural Resources (DNR) has received the above referenced documents for review and comment. This letter serves as a response to both documents.

## **Project Description**

The South Carolina Department of Transportation (Applicant) proposes to construct a new four - lane interstate roadway that will be approximately 75.3 miles on new alignment. This project will also include the construction of interchanges, over/underpasses and improvements to existing roadways at the interchanges and over/underpasses. The project would utilize a standard limited access interstate design with frontage roads and entrance/exit ramps at interchanges, stormwater facilities, grassed medians, shoulders, guide rails and barrier fences. In detail, the Interstate 73 (I-73) project will include permanent placement of fill materials/structures in a total of 4,661 linear feet of stream and a total of 293.1 acres of other waters, including wetlands.

## **Purpose and Need**

DNR was an active participant in the Agency Coordination Team (ACT) effort that facilitated the development of Final Environmental Impact Statements for both the northern and southern corridors of I-73 as part of the National Environmental Policy Act (NEPA) process. DNR submits the NEPA process and Record of Decision satisfied the determination of the proposed roadway purpose and need.

## **Environmental Update**

The I-73 South document indicates that impacts to streams increased from 3,805 linear feet to 4,571 linear feet as a result of refining the boundaries and limits of jurisdiction during field

Ms. Heather M. Robbins, AICP  
I-73 Re-evaluations  
April 3, 2017

reviews and USACE approval. Wetland impacts decreased by 2.9 acres between the approval of the 2010 Re-evaluation and the current document.

The I-73 North document indicates that impacts to wetlands increased from 57.2 acres to 75.8 acres due to changes in the limits and boundaries of jurisdictional areas during field delineations and USACE review and approval. Impacts to streams decreased from 14,994 linear feet to 3,322.9 linear feet as a result of re-classification by the USACE from streams to jurisdictional ditches. These linear features were determined to have been created in uplands for the purpose of draining predominantly upland areas.

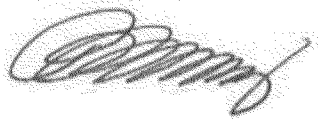
DNR submits that the changes to the affected environment as described in the documents do not result in a significant increase in the overall impacts associated with the proposed project provided that these impacts are reflected in the final compensatory mitigation plan.

### **Mitigation Plan**

The mitigation plan has been included in Appendix I of both documents. DNR concurs that the Applicant has proposed a mitigation plan that aligns with a high standard for projects that result in a significant amount of unavoidable impacts to Waters of the United States. DNR staff have worked with the Applicant to develop the proposed plan, and we submit that the proposed mitigation plan will result in profound natural resource benefits through protection of regionally significant wetlands and critical fish and wildlife habitats, while adding to the collective conservation efforts of DNR and its many public and private partners.

DNR notes that in Section 4.6 on page 37 of the plan, the second sentence should read "Until success has been documented, SCDOT will notify USACE and SCDHEC if any issues develop that requires maintenance within the restoration/enhancement areas."

Very truly yours,



Bob Perry  
Director, Office of Environmental Programs

cc: Kelly Laycock – EPA  
Steve Brumagin – Corps  
Pace Wilber – NMFS  
Tom McCoy – FWS  
Michelle Herrell – FHWA  
Heather Preston – DHEC-BOW  
Blair Williams – DHEC- OCRM